



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

MAY 19 2014



MEMORANDUM

SUBJECT: Heartland Plating ARARs Evaluation
Site ID: B780

FROM: Adam Ruiz, On-Scene Coordinator
Planning and Preparedness North Section
Superfund Division

THRU: Dave Williams, Chief
Planning and Preparedness North Section
Superfund Division

TO: File

In preparation of the Removal Action Memorandum for the Heartland Plating Site the U.S. Environmental Protection Agency requested Applicable or Relevant and Appropriate Requirements (ARARs) for the state of Iowa to be identified in a letter sent to the Iowa Department of Natural Resources on March 11, 2014. The following evaluation is for the ARARs provided by IDNR in their response letter dated March 26, 2014.

Chemical-Specific ARARs

1. Potential ARAR Identified: Chapter 567 IAC 133 – General groundwater cleanup rules.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve groundwater.
2. Potential ARAR Identified: Rule 567 IAC 135.9 (455B) – Risk-based screening levels for groundwater.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve groundwater.
3. Potential ARAR Identified: Chapter 567 IAC 137 – Voluntary cleanup program for groundwater.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve groundwater.
4. Potential ARAR Identified: Rule 567 IAC 135.9 (455B) – Risk-based soil screening levels related to underground storage tanks.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve soil and underground storage tanks are not present at the site.
5. Potential ARAR Identified: Chapter 567 IAC 137 – Statewide soil standards for exposure to contaminants in soil.



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Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve soil.

6. Potential ARAR Identified: Paragraph 567 IAC 137.6(9) "c" – Site-specific air standards for the state's voluntary cleanup program. In a workplace setting, applicable OSHA standards are used.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate since OSHA standards already will be observed during the removal.

Action-Specific ARARs

1. Potential ARAR Identified: Chapter 567 IAC 83 – Laboratory Certification.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because any analysis performed by EPA will not be required to be submitted to IDNR.
2. Potential ARAR Identified: Chapter 567 IAC 49 – Nonpublic well construction standards.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve well construction.
3. Potential ARAR Identified: Chapter 567 IAC 39 – Well abandonment requirements.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve well abandonment.
4. Potential ARAR Identified: Chapters 567 IAC 120 & 121 – Land application of sludge and other solid wastes.
Evaluation: This potential ARAR would not be applicable or relevant and appropriate because currently the EPA does not anticipate any removal actions which would involve land application.

Location-specific ARARs

No ARARs were identified for this section.